

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery Master

**NOTICE OF CROSS
MOTION FOR
PROTECTIVE ORDER**

**NOTICE OF THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER
PRECLUDING THE PRODUCTION OF DOCUMENTS WITHHELD AS
CHINESE STATE SECRETS**

To: Adam M. Slater, Esquire
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PLEASE TAKE NOTICE that on May 21, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an entry of a Protective Order precluding the production of documents withheld as Chinese state secrets.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Parties shall rely on the accompanying Brief in Opposition to Plaintiffs' Motion to Compel Production of Documents Withheld as Chinese State Secrets and in Support of Cross Motion for Protective Order.

PLEASE TAKE FURTHER NOTICE that, for the Court's convenience, a proposed form of Order pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys for the ZHP Parties request oral argument on this motion.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

May 21, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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